

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 1:20CR358
)	
Plaintiff,)	
)	JUDGE SARA LIOI
v.)	
)	
ROBERT D. McWILLIAMS,)	<u>UNITED STATES' MOTION TO FILE</u>
)	<u>SENTENCING MEMORANDUM UNDER</u>
Defendant.)	<u>SEAL</u>
)	

The United States of America, by its counsel, Bridget M. Brennan, Acting United States Attorney, and Carol M. Skutnik, Assistant United States Attorney, hereby requests the Court issue an order permitting the government to file its sentencing memorandum under seal.

On July 16, 2021, Defendant entered a plea of guilty to the Indictment that included violations of 18 U.S.C. §2251(a), Sexual Exploitation of Children, and 18 U.S.C. § 1591(a)(1) and (b)(2).

The government intends to file a sentencing memorandum that freely discusses the five named minor victims and the circumstances of the offense. 18 U.S.C. § 3509(d) addresses the unique privacy protections that apply to minor victims in these types of cases. The statute requires that documents that disclose the name or any other information concerning a child be kept in a secure place, and that papers filed in court that disclose information about the child be filed under seal. In addition, the government's memorandum addresses some sensitive matters

involving the Defendant. Accordingly, to protect the victim's privacy and to freely discuss the sentencing information applicable in this case, the government respectfully requests the Court issue an order permitting the government to file its sentencing memorandum under seal.

Respectfully submitted,

Bridget M. Brennan
Acting United States Attorney

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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of November 2021, a copy of the foregoing document was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/ Carol M. Skutnik
Carol M. Skutnik
Assistant U.S. Attorney